

24-cv-05986-RPK-LB

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK
AT BROOKLYN**

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ AUG 21 2024 ★

ROBERT ALEXANDER GRIMSLEY

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Civil Action No.: **BROOKLYN OFFICE**

Vs.

CIVIL RICO COMPLAINT

Jury Trial Demanded

NIKE, INC.; AMAZON.COM, INC.;

FACEBOOK, INC.; ABBOT LABORATORIES; MICROSOFT CORP.; ABBVIE INC.;
ACCENTURE INC.; ACCENTURE INC.; ACTIVISION BLIZZARD INC.; ADDIDAS
GROUP; ADVANCE PUBLICATIONS, INC.; AETNA, INC.; AFLAC, INC.; AIRBNB;
ALASKA AIR GROUP, INC.; ALBERTSONS COMPANIES, LLC.; ALCOA INC.;
ALIBABA GROUP; ALLSTATE CORP.; ALPHABET INC.; ALTICE USA; ALTRIA
GROUP, INC.; AMERICAN AIRLINES GROUP, INC.; AMERICAN ELECTRIC
POWER CO., INC.; AMERICAN EXPRESS CO.; AMERICAN GREETINGS CORP.;
AMERICAN INTL. GROUP, INC.; AMERISOURCEBERGEN; AMGEN, INC.;
ANHEUSER-BUSCH INBEV; ANTHEM, INC.; APPLE INC.; ARAMARK CORP.;
ARCELORMITTAL USA, INC.; ARCHER DANIELS MIDLAND CO.; ARMSTRONG
WORLD INDUSTRIES, INC.; AT&T INC.; AUTOMATIC DATA PROCESSING,
INC.; AUTONATION, INC.; AVON PRODUCTS, INC.; BANK OF AMERICA CORP.;
BARNES & NOBLE, INC.; BAYER AG; BAXTER INTERNATIONAL INC.; BEAR
STEARNS COS. INC.; BECTON, DICKINSON & CO.; BERKSHIRE HATHAWAY
INC.; BEAR STEARNS COS. INC.; BECTON, DICKINSON & CO.; BERKSHIRE
HATHAWAY INC.; BERTELSMANN AG; BEST BUY CO., INC.; BLACKSTONE
GROUP LP, THE; BOEING CO.; BOOKING HOLDINGS INC.; BRINK'S CO., THE;
BRISTOL-MYERS SQUIBB CO.; BROWN-FORMAN CORP.; BRUNSWICK CORP.;
CAESARS ENTERTAINMENT CORP.; CAMPBELL SOUP CO.; CAPITAL ONE
FINANIAL CORPORATION; CARDINAL HEALTH, INC.; CARLYLE GROUP, THE;
CATERPILLAR INC.; CBRE GROUP, INC.; CBS CORP.; CENTURYLINK, INC.;
CHARTER COMMUNICATIONS, INC.; CHEVRON CORP.; CHIQUITA BRANDS
INTL. INC.; CHS, INC.; CHUBB LTD.; CHURCH & DWIGHT CO., INC.; CIGNA
CORP.; CINTAS CORP.; CISCO SYSTEMS, INC.; CITIGROUP, INC.; CLOROX CO.;
COACH, INC.; COCA-COLA CO.; COLGATE-PALMOLIVE CO.; COMCAST CORP.;
CONAGRA BRANDS, INC.; CONOCOPHILLIPS CO.; CONSOLIDATED EDISON,
INC.; CONTINENTAL AIRLINES, INC.; CORNING INC.; CORTEVA, INC.;

COSTCO WHOLESALE CORP.; COUNTRYWIDE FINANCIAL; CROWN HOLDINGS, INC.; CSX CORP.; CVS HEALTH; DANA HOLDING CORP.; DARDEN RESTAURANTS, INC.; DEAN FOODS CO.; DEERE & CO.; DELL INC.; DELTA AIR LINES, INC.; DILLARD'S, INC.; DISH NETWORK CORP.; WALT DISNEY CO., THE; DOCTOR'S ASSOCIATES INC.; DOLE FOOD CO., INC.; DOLLAR TREE; R.R. DONNELLEY & SONS CO.; DOW INC.; DR PEPPER SNAPPLE GROUP, INC.; DUKE ENERGY CORP.; DUN & BRADSTREET CORP.; DUPONT DE NEMOURS, INC.; DXC TECHNOLOGY; EASTMAN KODAK CO.; EATON CORP.; EBAY INC.; EDISON INTL.; ELECTRONIC ARTS INC.; ELI LILLY AND CO.; EMERSON ELECTRIC CO.; ENERGIZER HOLDINGS, INC.; ENTERPRISE PRODUCTS PARTNERS L.P.; ESTEE LAUDER COS. INC.; EXELON CORP.; EXPRESS SCRIPTS HOLDING CO.; EXXONMOBIL CORP.; FEDERAL HOME LOAN MORTGAGE CORP.; FEDERAL NATL. MORTGAGE ASSN.; FEDEX CORP.; FIRST DATA CORP.; FIRST ENERGY CORP.; FLUOR CORP.; FOOT LOCKER, INC.; FORD MOTOR CO.; FOX CORP.; GANNETT CO., INC.; GAP INC.; GARRETT MOTION; GENERAL DYNAMICS CORP.; GENERAL ELECTRIC CO.; GENERAL MILLS, INC.; GENERAL MOTORS CO.; GENUINE PARTS CO.; GILEAD SCIENCES, INC.; GOLDMAN SACHS GROUP, INC.; GOODYEAR TIRE & RUBBER CO.; GOOGLE, INC.; GRAHAM HOLDINGS CO.; HALLIBURTON CO.; HANESBRANDS INC.; HARLEY-DAVIDSON, INC.; HARTFORD FINANCIAL SERVICES GROUP, INC.; HASBRO, INC.; HCA HOLDINGS, INC.; HENKEL CORP.; HERSHEY CO., THE; HERTZ GLOBAL HOLDINGS, INC.; HESS CORP.; HEWLETT PACKARD ENTERPRISE; HILTON WORLDWIDE; HOME DEPOT, INC.; HONEYWELL INTL. INC.; HORMEL FOODS CORP.; HOSTESS BRANDS; HOUGHTON MIFFLIN HARCOURT CO.; HP INC.; H&R BLOCK, INC.; HUMANA INC.; IAC/INTERACTIVECORP.; IHEARTMEDIA, INC.; ILLINOIS TOOL WORKS INC.; INGERSOLL-RAND PIC; INTEL CORP.; INTERNATIONAL BUSINESS MACHINES CORP.; INTERNATIONAL PAPER CO.; INTL FCSTONE INC.; J.C. PENNEY CO., INC.; J.CREW GROUP, INC.; JETBLUE AIRWAYS CORP.; JO-ANN STORES, INC.; JOHNSON CONTROLS INTL.; JOHNSON & JOHNSON; S.C. JOHNSON & SON, INC.; JPMORGAN CHASE & CO.; KBR, INC.; KELLOGG CO.; KELLY SERVICES, INC.; KEURIG DR PEPPER; KINDER MORGAN, INC.; KOCH INDUSTRIES, INC.; KIMBERLY-CLARK CORP.; KRAFT HEINZ CO.; KROGER CO.; L BRANDS, INC.; LAS VEGAS SANDS CORP.; LA-Z-BOY INC.; LEVI STRAUSS & CO.; LIBERTY MUTUAL HOLDING CO. INC.; LINKEDIN CORP.; LIZ CLAIBORNE, INC.; L.L. BEAN, INC.; LOCKHEED MARTIN CORP.; LOEWS CORP.; LOWE'S COS., INC.; LSC COMMUNICATIONS; MACY'S, INC.; MANPOWERGROUP; MARATHON OIL CORP.; MARRIOTT INTERNATIONAL, INC.; MARS, INC.; MASSACHUSETTS MUTUAL LIFE INSURANCE CO.; MASTERCARD INC.; MATTEL, INC.; MCCLATCHY CO.; MCDONALD'S CORP.; MCKESSON CORP.; MERCK & CO., INC.; MEREDITH CORP.; METLIFE, INC.;

MGM RESORTS INTL.; MOLSON COORS BREWING CO.; MONDELEZ INTERNATIONAL, INC.; MORGAN STANLEY; MOTOROLA SOLUTIONS, INC.; NATIONWIDE MUTUAL INSURANCE CO.; NAVISTAR INTL. CORP.; NBCUNIVERSAL; NCR CORP.; NESTLE USA, INC.; NETFLIX, INC.; NEW YORK LIFE INSURANCE CO.; NEW YORK TIMES CO.; NEWELL BRANDS; NEWS CORP.; NEXTERA ENERGY, INC.; NOKIA; NORDSTROM, INC.; NORFOLK SOUTHERN CORP.; NORTHROP GRUMMAN CORP.; NORTHWEST AIRLINES CORP.; NORTHWESTERN MUTUAL LIFE INSURANCE CO.; OATH INC.; OCCIDENTAL PETROLEUM CORP.; OFFICE DEPOT, INC.; OMNICRON GROUP INC.; ORACLE CORP.; PAYLESS SHOESOURCE, INC.; PEPSICO, INC.; PFIZER, INC.; PG&E CORP.; PHILLIP MORRIS INTL. INC.; PHILLIPS 66 CO.; PITNEY BOWES INC.; POST HOLDINGS, INC.; PPG INDUSTRIES, INC.; PRICELINE GROUP INC.; PROCTOR & GAMBLE CO.; PRUDENTIAL FINANCIAL, INC.; PUBLIX SUPER MARKETS INC.; PVH CORP.; QUALCOMM INC.; QUEST DIAGNOSTICS INC.; RADIOSHACK CORP.; RALCORP HOLDINGS, INC.; RALPH LAUREN CORP.; RAYTHEON CO.; READER'S DIGEST ASSN., INC.; REPUBLIC SERVICES, INC.; RESIDEO TECHNOLOGIES INC.; RESTAURANT BRANDS INTL.; REVLON, INC.; REYNOLDS AMERICAN INC.; RTE AID CORP.; ROCKWELL AUTOMATION, INC.; RYDER SYSTEM, INC.; S&P GLOBAL, INC.; SCHLUMBER LIMITED CO.; SEARS HOLDINGS CORP.; SHELL OIL CO.; SHERWIN-WILLIAMS CO.; SIMON PROPERTY GROUP, INC.; SINCLAIR BROADCAST GROUP, INC.; SIRIUS XM HOLDINGS INC.; SMITHFIELD FOODS, INC.; J.M. SMUCKER CO.; SNAP INC.; SONY CORP. OF AMERICA; SOUTHWEST AIRLINES CO.; SPRINT CORP.; STANLEY BLACK & DECKER, INC.; STAPLES, INC.; STARBUCKS CORP.; STARWOOD HOTELS & RESORTS WORLDWIDE, INC.; STATE FARM MUTUAL AUTOMOBILE INS. CO.; SUN MICROSYSTEMS, INC.; SUPERVALU INC.; SYSCO CORP.; TAPESTRY, INC.; TARGET CORP.; TEGNA, INC.; TENNECO INC.; TESLA MOTORS, INC.; TEXAS INSTRUMENTS INC.; TEXTRON INC.; 3M CO.; TIAA; TIME INC.; TJX COS., INC.; T-MOBILE US, INC.; TORO CO.; THE TRAVELERS COMPANIES, INC.; TRIBUNE MEDIA CO.; TRIBUNE PUBLISHING CO.; TRUSTED MEDIA BRANDS, INC.; 21ST CENTURY FOX, INC.; TWITTER, INC.; TYCO INTL. LTD.; TYSON FOODS, INC.; UBER; UBS FINANCIAL SERVICES INC.; UNILEVER USA; UNION PACIFIC CORP.; UNISYS CORP.; UNITED AIRLINES HOLDINGS, INC.; UNITED PARCEL SERVICE, INC.; UNITED STATES STEEL CORP.; UNITED TECHNOLOGIES CORP.; UNITEDHEALTH GROUP INC.; U.S. BANCORP; VALERO ENERGY CORP.; VERIZON COMMUNICATIONS INC.; VF CORP.; VIACOM INC.; VISA INC.; VISTEON CORP.; WALGREENS BOOTS ALLIANCE, INC.; WALMART INC.; WARNERMEDIA INC.; WASHINGTON POST CO.; WASTE MANAGEMENT, INC.; WELLPOINT, INC.; WELLS FARGO & CO.; WENDY'S CO.; WESTERN UNION CO.; WESTROCK CO.; WEYERHAEUSER CO.; WHIRLPOOL CORP.; WHOLE FOODS MARKET, INC.; WINNEGBAGO INDUSTRIES, INC.;

WM. WRIGLEY JR. CO.; WORLD FUEL SERVICES CORP.; XEROX CORP.; WAXIE'S ENTERPRISES INC.; YUM! BRANDS, INC.; PHIL KNIGHT; JEFF BEZOS; ELON MUSK; MARK SCHNEIDER; BILL GATES; WARREN BUFFETT; LAURENE POWELL JOBS; JIM CRAMER; MELINDA GATES; STEVE BALLMER; MICHAEL DELL; JACQUELINE MARS; JOHN MARS; LARRY PAGE; CHARLES KOCH; DAVID KOCK; RAY DALIO; FRANCOISE BETTENCOURT MEYERS; JIM WALTON; ALICE WALTON; ROB WALTON; MARK ZUCKERBERG; GIOVANNI FERRERO; SUSANNE KLATTEN; DAVID THOMPSON; RUPERT MURDOCH; BOB BARKER COMP. INC.; CITY OF NEW YORK, NY.; CITY OF SEATTLE, WA.; CITY OF MENLO PARK, CA.; CITY OF SAN JOSE, CA.; CITY OF ATLANTA, GA.; CITY OF DALLAS, TX.; MEDOSWEET FARMS; SMITH BROTHERS FARMS; CITY OF KENT, WA.; LOCHMEAD FARMS; CITY OF JUNCTION CITY, OR.; ALPENROSE DAIRY; CITY OF PORTLAND, OR.; WILLAMETTE VALLEY FARMS; DFA DAIRY BRANDS, LLC.; CITY OF KANSAS CITY, KS.; SHAMROCK FARMS DAIRY; CITY OF PHOENIX, AZ.; UNIVERSITY OF OREGON; COLUMBIA UNIV. SCHOOL OF GENERAL STUDIES; UNIV. OF NOTRE DAME; HARVARD UNIV.; NEW YORK UNIV.; PRINCETON UNIV.; YALE UNIV.; PEPPERDINE UNIV.; WILLAMETTE UNIV.; OREGON BAR ASSOC.; SOUTHERN METHODIST UNIV.; BRIGHAM YOUNG UNIV.; COLUMBIA UNIV.; JOHNS HOPKINS UNIV.; UNIV. OF MIAMI; UNIV. OF WASHINGTON; UNIV. OF SOUTHERN CALIFORNIA; UNIV. OF LA VERNE; UNIV. OF PENNSYLVANIA; TUFTS UNIV.; TULANE UNIV.; ST. LAWRENCE UNIV.; SANTA CLARA UNIV.; SARAH LAWRENCE COLL.; NORTHEASTERN UNIV.; LEHEIGH UNIV.; LEWIS & CLARK COLL.; GEORGETOWN UNIV.; FRANKLIN & MARSHALL COLL.; FAIRFIELD UNIV.; GRINNEL COLL.; HAMILTON COLL.; EMORY UNIV.; DARTMOUTH COLL.; COLORADO COLL.; COLL. OF WOOSTER; CARNEGIE MELLON UNIV.; CARLETON COLL.; BOWDOIN COLL.; BOSTON UNIV.; BATES COLL.; BRANDEIS UNIV.; BELOIT COLL.; BAYLOR UNIV.; AMHERST COLL.; BABSON COLL.; BROWN UNIV.; CHAPMAN UNIV.; CLAREMONT MCKENNA COLL.; BARNARD COLL.; COLL. OF THE HOLY CROSS; COLGATE UNIV.; COLBY COLL.; COE COLL.; CLARKSON UNIV.; CLARK UNIV.; CONNECTICUT COLL.; CORNELL UNIV.; RICE UNIV.; TEXAS CHRISTIAN UNIV.; UNIV. OF RICHMOND; UNIV. OF ROCHESTER; UNIV. OF PUGET SOUND; UNIV. OF REDLANDS; PORTLAND STATE UNIV.; UNIV. OF PORTLAND; POMONA COLL.; OREGON STATE UNIV.; WILLIAM BARR; ELLEN ROSENBLUM; TINA KOTEK; TIMOTHY SYLWESTER; ELAINE BURGE; LUNG S. HUNG; ERIN K. LANDIS; MICHAEL MOSMAN; MARCO HERNANDEZ; PATRICIA SULLIVAN; KAREN J. IMMERGUT; LAURA TAYLOR SWAIN; DAVID M. GOLDTHORPE; STACIE F. BECKERMAN; MICHAEL H. SIMON; BETH LABSON FREEMAN; BARACK OBAMA; MARK B. BUSBY; TIFFANY SALINAS-HARWELL; ADA E. BROWN; RENEE HARRIS TOLIVER; BRYAN A. GARNER; KAROLYNE H.C. GARNER; LAWPROSE, INC.; PAUL SCHIFF BERMAN; JOHN G. ROBERTS JR.;

CLARENCE THOMAS; STEPHEN G. BREYER; SAMUEL A. ALITO JR.; SONIA SOTOMAYOR; AMY CONY BARRETT; ELENA KAGAN; NEIL M. GORSUCH; BRETT KAVANAUGH; CITY OF WASHINGTON, D.C.; JOE BIDEN; DONALD TRUMP; DEPT. OF TREASURY; DEPT. OF JUSTICE; DEPT. OF HOMELAND SECURITY; SECURITIES AND EXCHANGE COMMISSION; JAY CLAYTON; OREGON COMMISSION ON JUDICIAL FITNESS; CITY OF BEAVERTON, OR.; CITY OF SALEM, OR.; CITY OF EUGENE, OR.; DANIEL KRUSE; JEFF DODGE; JAMIE MILLER; TIM WELSH; BETHANY SMITH; HEIDI STEWART; GREG JONES; CATHY BRYANT KAE; ASHLEY CONWAY; THE VOKRAL FAMILY; RYAN MILLS; DOLORES ("DOLLY") MATTEUCCI; CINDY M. BROWN; NICOLE BROWN; RACHEL REYNA; VALLEY FAMILY HEALTH CARE; LIFEWAYS INC.; ASHLEY CLEMENTS; ANDIE CORTES; SAMUEL ZINIE; HAYLEE HARDING; RYAN MAAG; MALHEUR CO. SHERIFFS DEPT.; BRIAN WOLFE; WILLIAM REYNOLDS; LARRY GILLUM; MALHEUR CO. TRANSPORTS; CITY OF ONTARIO, OR.; CITY OF VALE, OR.; CITY OF WILSONVILLE, OR.; COUNTY OF CLACKAMAS, OR.; COUNTY OF WASHINGTON, OR.; COUNTY OF MARION, OR.; CITIZENS UNITED FOR THE REHABILITATION OF ERRANTS ("CURE"); OREGON CURE; ROBERT S. HUEY; EDOVO INC.; CITY OF CHICAGO, IL.; KAMALA HARRIS; UNIV. OF CHICAGO; CITY OF SAN DIEGO, CA.; J. NOETHE; JOHN & JANE DOES (Every company and CEO thereto trading on the stock market, all shareholders, stakeholders, aiders, abettors, profitters, customers, participants & conductors to the RICO, directly and indirectly.) ; JENNIFER NORRIS; DANIEL NORRIS; RENEE DENNISON; META PLATFORMS, INC.; DARIGOLD, INC.; NVIDIA CORP.; AI LAB, INC.; BOX INC.; CLEARVIEW AI; VINTRA; 23ANDME; ANNE WOJCICKI; JEFF YASS;

DEFENDANTS.

1. This is a civil action authorized by 18 U.S.C. §1964 to redress the injury to business & property sustained from 1962 prohibited activities in a RICO conspiracy. Id. §1962(d).
2. The Eastern District of New York – At Brooklyn – is an appropriate venue under 18 U.S.C. §1965, which may be instituted "against any person...for any district in which such person resides, is found, has an agent, or transacts his affairs[.]" Id. §1965(a). Venue application under Title 28 does not apply to RICO. See 28 U.S.C. §1391(a).

3. Plaintiff has been kidnapped and trafficked since 2018 by Defendants' Enterprise under these circumstances: simulating lawful incarceration or detainment – including simulated arrests.

4. On dates 4/11/18, 7/10/18, 8/9/18, associates Tim Welsh, Bethany Smith, and Heidi Steward performed fraud in the facta and actual fraud by executing instruments ORS. 137.370(4)&(2) contrary to statute by cutting and pasting, then inputted plaintiff as an Adult in Custody ("AIC") data text & object on The Enterprises information systems software and database that communicated electronically over a wide area network (See <https://docpub.state.or.us//OOS/searchCriteria.jsf>); which directs and coordinates frontline associates to use lethal force at facilities within The Organization. These predicate acts by above-mentioned associates are in furtherance of Defendants' Enterprise, which works cohesively to profit and provide logistical support in the facilitation of the long-term manstealing of plaintiff's corpus with the distribution of their products and services into the facilities and scheme execution thereof.

5. As a result of defendants' racketeering, plaintiff had a vehicle repossessed and has been unable to seek gainful employment while kidnapped; Plaintiffs physical & psychological attributes are undeveloped given the nonexistence of material for sensation/ life experiences; plaintiff developed chronic COVID at the manstealing facilities and was subjected to beatings and torture thereto.

Therefore, the plaintiff demands judgment against Defendants' Enterprise for \$10trn, plus costs.

Irreparable Injury

If the court does not issue the appropriate orders to prevent & restrain violations of section 1962 by Defendants' Enterprise, then plaintiff will continue to be kidnapped & trafficked.

Verification & Service

I, Robert Grimsley, under penalty of perjury, have read this complaint and hereby verify that the matters alleged herein are true. And certify that on 8/13/2024, I mailed this verified complaint to the District Court for the Eastern District of New York – At Brooklyn. Addressed To:

Clerk of Court
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201



Robert A. Grimsley

Respectfully Submitted,



Robert A. Grimsley
Pro Se

Oregon Department of Corrections - AIC Mail

Institution SRCL SID *21089091*

Name Robert Grimsley

Address 777 Stanton Blvd

City Ontario State OR Zip 97914

GRIMSLEY, ROBERT - 21089091

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